

Message

---

**From:** Biggio, Patricia [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2A9A640A9A2941C5A9BE1C4967E71718-BIGGIO, PAT]  
**Sent:** 4/23/2020 2:03:23 PM  
**To:** Cyran, Carissa [Cyran.Carissa@epa.gov]  
**CC:** Friedman, Dana [Friedman.Dana@epa.gov]; Godshall, Joshua [Godshall.Joshua@epa.gov]  
**Subject:** FW: TCVP Response Statement 042320.docx  
**Attachments:** TCVP 9th Circuit Court 4.22.20.pdf

Thank you for the highlights, Carissa. The revised human health DRA, which is available to the public in the registration review docket, identified potential risks of concerns for several scenarios and was issued in December 2016. These potential risks were based on assumption of the composition of the pet collar, in other words is TCVP present as a dust or liquid.

In the draft information points, we noted that we entered negotiations with Hartz in 2017 to verify the composition. The negotiations ultimately lead to us issuing the DCI in June 2019.

Not sure if this helps the question below, let me know if you would like to discuss more.

---

**From:** Cyran, Carissa <Cyran.Carissa@epa.gov>  
**Sent:** Thursday, April 23, 2020 9:54 AM  
**To:** Biggio, Patricia <biggio.patricia@epa.gov>  
**Subject:** Re: TCVP Response Statement 042320.docx

Thank you Trish! I think this should work, especially since the court's biggest issue was the Agency's delay.

Is there anything we can say about the statement on page 4 that EPA has "acknowledged that the pesticide poses widespread, serious risks to neurodevelopmental health of children"? Or, have we stated this?

I've attached the court document with the negative statements highlighted.

---

**From:** Biggio, Patricia <biggio.patricia@epa.gov>  
**Sent:** Thursday, April 23, 2020 9:47 AM  
**To:** Cyran, Carissa <Cyran.Carissa@epa.gov>  
**Subject:** TCVP Response Statement 042320.docx

Hi Carissa,

A few attachments that may (or may not) bridge the gap between our March 2017 response and present day. The team is still looking over our response statement, but we provided it here if it can be of help to get things moving. I'll confirm if any changes are made.

Also attached is a one-pager drafted specifically for the petition, so no other reg review items may necessarily be included. It was last updated in December, so you may see some milestones that are out of date.

Thanks!  
Trish  
703-347-0547